

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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DABUR INDIA LTD, and DABUR :  
INTERNATIONAL USA, : Civil Action No: 2:21-cv-11402-ES-CLW  
:  
Plaintiffs, : **STIPULATION**  
:  
-against- :  
:  
MEENAXI ENTERPRISES INC., NUPUR :  
TRADING LLC, TATHASTU TRADING :  
LLC, MEENAXI GANDHI, ALKA :  
“HERMANG” AMIN and RASHMI DESAI :  
:  
Defendants. :  
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**WHEREAS**, on May 18, 2021, plaintiffs Dabur India Ltd, and Dabur International USA (together, “Dabur” or “Plaintiffs”) filed a Complaint (Dkt. 1) in the above-captioned action against defendants Meenaxi Enterprises Inc., Nupur Trading LLC, Tathastu Trading LLC, Meenaxi Gandhi, Alka “Hermang” Amin and Rashmi Desai; and

**WHEREAS**, by Motion, dated June 29, 2021, Plaintiffs sought Entry of Default against defendants Tathastu Trading, LLC and Rashmi Desai (the “Tathastu Defendants”) (Dkt. 13); and

**WHEREAS**, pursuant to that Motion, on July 6, 2021, the Clerk entered default against the Tathastu Defendants; and

**WHEREAS**, by Motion, dated July 9, 2021, Plaintiffs sought a Default Judgment against the Tathastu Defendants (Dkt. 16), which Motion is returnable on August 2, 2021; and

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for the parties hereto, as follows:

1. The Clerk’s Entry of Default as to the Tathastu Defendants, dated July 6, 2021, is hereby vacated;

2. Plaintiff's Motion for a Default Judgement as to Tathastu Defendants, dated July 9, 2021 (Dkt. 16), is hereby withdrawn; and
3. The Tathastu Defendants' deadline to answer, move against, or otherwise respond to the Complaint, dated May 18, 2021 (Dkt. 1), is hereby extended until August 9, 2021.

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be executed in counterparts and/or by facsimile or other electronic transmission, each of which when executed shall be deemed to be an original and all of which together shall constitute a single instrument binding upon the parties.

Dated: July 19, 2021

**THE INGBER LAW FIRM**

**RUSKIN MOSCOU FALTISCHEK, P.C.**

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SO ORDERED:

/s/ Esther Salas  
**Hon. Esther Salas, U.S.D.J.**  
**Date:** July 26, 2021